

February 27, 2002

United States Environmental Protection Agency
Enforcement and Compliance Docket and Information Center
Mail Code 2201A
Attn: Docket #EC-2000-007
1200 Pennsylvania Avenue, NW
Washington, DC 20460

SUBJECT: Selected States? Comments on Proposed EPA Cross-Media Electronic Reporting and Records Rule (CROMERRR); Docket #EC-2000-007

Dear Sir / Madam:

The Maine Department of Environmental Protection is writing to add its support to the comments submitted by ECOS in a letter from Robert E. Roberts, Executive Director on February 27, 2002.

We are concerned that the proposed language of the rule is overly prescriptive and will not achieve the goals of fostering efficient and effective electronic environmental reporting. We have also received comments from local industry groups that the electronic record keeping requirements will be very expensive and difficult to implement.

I am hopeful that you will be able to use the ECOS drafted comments to improve the overall approach to this regulation and find a way to provide more flexibility in implementation without compromising the security and enforceability of the information reported.

Sincerely,

Martha G. Kirkpatrick
Commissioner

